



City and County of San Francisco
DEPARTMENT OF PUBLIC HEALTH
ENVIRONMENTAL HEALTH

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June 25, 2015

Mr. Derek Johnson
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SFDPH Comments on the Draft Finding of Suitability to Transfer for Parcel B-1, Hunters Point Naval Shipyard, San Francisco, California, dated March 2015

Dear Derek:

General Comments

1. SFDPH may have additional comments on the FOST following receipt of Navy response to comments on the Draft Remedial Action Completion Report for Parcel B-1 particularly in relation to the remedial action at Building 123/IR-10.
2. It would be very helpful for preparation of subsequent documents that are necessary for the transfer, e.g. the Statement of Facts for the Covenant to Restrict Use of Property and Section 2.0 of the Risk Management Plan, if you could list the specific COCs that remain in soil, groundwater, and soil gas at concentrations above remedial goals or action levels. If you do not wish to include this information in the FOST, it would be helpful if this information could be sent separately.

Specific Comments:

3. **Section 3.3.1, Pre-ROD Removal Actions, page 4:** Please clarify whether sand blast grit was removed from Parcel B-1.
4. **Section 3.3.1, ASTs, page 8:** Please add the reference which documents removal of the former ASTs at Buildings 115 and 120.
5. **Section 3.5, Asbestos-Containing Materials, First paragraph, page 9:** At the end of the paragraph it says ACM remains in all buildings. Later, in the notice section 5.2 it says that ACM is presumed to exist on any steam lines remaining on the property. If this is the case, this fact should be stated in Section 3.5.
6. **Section 3.7, PCBs, page 11:** Please clarify whether the PCB-bearing electrical equipment scheduled for removal in 1998 was in fact removed from Parcel B-1 as planned.
7. **Section 4.0, Adjacent Parcels, second paragraph, page 12:** This paragraph states: "There is little potential for radioactive materials in adjacent parcels to pose a risk at the Property. The only

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potential exposure pathway for radiological exposure would be via inhalation of windblown dust from uncovered areas. The Navy maintains active dust control measures for all radiologically impacted areas at HPNS, including those adjacent to the Property (Tetra Tech EC, Inc. 2009). The basewide radiological contractor periodically measures the dose rate at the perimeter of all radiologically impacted areas, and these measurements indicate no migration of radiological materials. Likewise, basewide monitoring for dust does not indicate radioactive contamination in the dust.”

The wording in this paragraph is awkward and is suggesting a possibility that we don’t think exists. All of the radiological cleanup work has been completed on all sides of Parcel B-1 – correct? So there are no areas with any possible radiological contamination in proximity to B-1. And the majority of the areas around B-1 also have a durable cover installed with the exception of the area adjacent to Parcel C near IR-06 and Bldg 134 where there is ongoing SVE and other remediation. But those uncovered areas do not have any remaining radiological concerns. And your paragraph makes the argument that even if dust exists, your monitoring does not indicate radioactive contamination in the dust. We recommend deleting this paragraph.

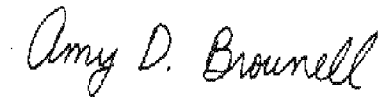
8. **Section 4.0, Adjacent Parcels, Northwest – IR Sites 7 and 18, first two paragraphs:** We recommend deleting the first two paragraphs because they are describing possibilities that might have occurred prior to the IR Sites 7 and 18 FOST being issued and the methane probes having been removed. And then adding a paragraph after the one entitled “Completed Remedial Actions” and explain in a few sentences that this site has been found suitable for transfer in an approved FOST (with information on regulatory concurrence.) And then describe why the property does not pose of risk from groundwater, soil gas or contaminants in soil, including radiological materials because all necessary remediation was undertaken and the FOST documented that the property is suitable for transfer for the intended use.
9. **Section 4.0, South – Parcel C and former Parcel A, page 14, paragraph 2:** Section 4.0 states “Groundwater flows from IR Site 25 at adjacent Parcel C onto the Property. Groundwater in this area (termed RU-C5) has been adequately characterized and is being actively remediated. Remediation is expected to address any potential migration of VOCs in groundwater from Parcel C.” Please clarify that the RU-C5 plume at Parcel C extends onto Parcel B-1 as evidenced by vinyl chloride concentrations in groundwater greater than RGs at well IR20MW17A and that remediation at Parcel C is “*expected to address any ongoing migration*” of VOCs from Parcel C to Parcel B-1.
10. **Section 4.0, South – Parcel C and former Parcel A, page 14, paragraph 3, last sentence:** Please state that soil gas confirmation sampling will be conducted to confirm that the remediation has addressed any potential soil gas migration from Parcel C.

11. **Section 5.3, Lead-Based Paint, page 15:** Consistent with recent clarification edits that were made to the UC1 and UC2 deeds, please add "resulting from LBP" following the phrase "soil-lead hazards" in the 12th and 16th lines of this paragraph.
12. **Section 7, Covenants, Lead-Based Paint, page 18:** Consistent with recent clarification edits that were made to the UC1 and UC2 deeds, please add "resulting from LBP" following the phrase "soil-lead hazards" in the 4th line of the paragraph.
13. **Figure 5, Petroleum Program:** Please show the locations of the former ASTs at Buildings 115 and 120 on Figure 5.

Minor Comments:

14. **General:** Check acronyms singular or plural e.g., VOCs versus "VOC"; "AST" versus ASTs.
15. **Section 2.0, Property Description, page 1, paragraph 1, 1st sentence:** Awkward "San Francisco Bay, California."
16. **Section 3.3.3, Fuel Pipelines:** Refer to Figure 5.
17. **Section 4.0, Northeast, page 13, paragraph 2, 1st sentence:** Typo – double periods.

Sincerely,



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